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OFFICES IN:
MANCHESTER
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PORTSMOUTH
NASHUA

August 2, 2002

Via Hand Delivery

David R. Connell, Esquire
Corporation Counsel
229 Main Street
P.O. Box 2019
Nashua, NH 03061-2019

Re: City of Nashua's First Set of Data Requests

Dear Mr. Connell:

Pursuant to PUC Rule 204.04(d), I enclose Philadelphia Suburban Corporation's and Pennichuck Water Works, Inc., Pittsfield Aqueduct Company and Pennichuck East Utility, Inc.'s Objections to the City of Nashua's First Set of Data Requests. We will be submitting our responses to the remaining data requests by August 12.

Please call me if you have any questions about this matter.

Very truly yours,

Sarah B. Knowlton
/s/

Sarah B. Knowlton

SBK:ksm
Enclosure

cc: Kathy Pape, Esquire
Maurice L. Arel, President & CEO
Richard A. Samuels, Esquire
Service List

RECEIVED
AUG 02 2002

Office of Corporation Counsel
City of Nashua, NH

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DRC JLS DC

Pennichuck Water Works, Inc.
Pennichuck Aqueduct Company
Pennichuck East Utility, Inc.

DW 02-126

Philadelphia Suburban Corporation's Response to City of Nashua's First Set of Data Requests

Date Request Received: July 29, 2002
Data Request No.: Nashua – PSC 1-1

Date of Response: August 2, 2002

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- REQUEST:** Please list all of the acquisitions of water or water and sewer utility companies by Philadelphia or its subsidiaries or affiliates since 1996 whether through purchase, merger or otherwise. For each acquisition please give the name and address of the utility acquired, the utility regulatory body or bodies that approved the acquisition and the docket or record number of the proceeding granting the approval.
- OBJECTION:** PSC objects to providing a list of water or water and sewer utilities acquired by its subsidiaries or affiliates since such information is not relevant to this proceeding nor likely to lead to the admission of relevant evidence. In addition, PSC objects to this request to the extent that it seeks the address, the utility regulatory body that approved the acquisition, and the docket or record number of the proceeding granting the approval since this information is not relevant or likely to lead to the admission of relevant evidence in this proceeding. PSC also objects on the grounds that the request for the address of the utility acquired is vague and ambiguous. Without waiving this objection, PSC will provide the name of the water or water and sewer utility companies acquired by it and the states in which they operate.

Pennichuck Water Works, Inc.
Pennichuck Aqueduct Company
Pennichuck East Utility, Inc.

DW 02-126

Philadelphia Suburban Corporation's Response to City of Nashua's First Set of Data Requests

Date Request Received: July 29, 2002
Data Request No.: Nashua PSC 1-2

Date of Response: August 2, 2002

REQUEST: For each of the acquisitions listed in request 1-1 above with more than 5,000 water customers, please provide a copy of the annual report to the state regulatory bodies for the year immediately prior to the acquisition and for the year ending December 31, 2001.

OBJECTION: PSC objects to this request on the basis that it seeks information that is not relevant to this proceeding, nor likely to lead to the admission of relevant evidence since it will not elucidate whether the purchase of Pennichuck Corporation by PSC will cause no net harm to the Pennichuck Utilities' ratepayers.

Pennichuck Water Works, Inc.
Pennichuck Aqueduct Company
Pennichuck East Utility, Inc.

DW 02-126

Philadelphia Suburban Corporation's Response to City of Nashua's First Set of Data Requests

Date Request Received: July 29, 2002
Data Request No.: Nashua PSC 1-6

Date of Response: August 2, 2002

REQUEST: For 1996 and each subsequent year, please list the total earnings of all subsidiaries of Philadelphia before dividend payout and the total amount of dividends paid out by them.

OBJECTION: PSC objects to this request since it seeks information that is not relevant nor likely to lead to the admission of relevant evidence in this proceeding. Without waiving this objection, PSC will provide a copy of its policy for payout of dividends by its subsidiaries in response to Nashua PSC 1-5.

Pennichuck Aqueduct Company
Pennichuck East Utility, Inc.

DW 02-126

Philadelphia Suburban Corporation's Response to City of Nashua's First Set of Data Requests

Date Request Received: July 29, 2002
Data Request No.: Nashua PSC 1-7

Date of Response: August 2, 2002

REQUEST: Please identify any Philadelphia corporate policies on short, intermediate or long-range planning for subsidiaries. Please provide the guidelines, instructions or forms for such planning activities.

OBJECTION: PSC objects to the extent this request seeks guidelines, instructions or forms for its planning activities since this information is not relevant or likely to lead to the admission of relevant evidence in this proceeding. Without waiving this objection, PSC will produce a copy of its policy on long-range planning for subsidiaries and will explain the process therefor.

Pennichuck Water Works, Inc.
Pennichuck Aqueduct Company
Pennichuck East Utility, Inc.

DW 02-126

Philadelphia Suburban Corporation's Response to City of Nashua's First Set of Data Requests

Date Request Received: July 29, 2002
Data Request No.: Nashua PSC 1-8

Date of Response: August 2, 2002

REQUEST: Please identify any Philadelphia corporate policies for investment and/or reinvestment in the plant and equipment of subsidiaries. Please provide the guidelines, instructions or forms for such planning activities.

OBJECTION PSC objects to the extent this request seeks guidelines, instructions or forms for its planning activities since this information is not relevant or likely to lead to the admission of relevant evidence in this proceeding. Without waiving this objection, PSC will produce a copy of its policy on investment and reinvestment in the plant and equipment of its subsidiaries.

Pennichuck Water Works, Inc.
Pennichuck Aqueduct Company
Pennichuck East Utility, Inc.

DW 02-126

Philadelphia Suburban Corporation's Response to City of Nashua's First Set of Data Requests

Date Request Received: July 29, 2002
Data Request No.: Nashua PSC 1-11

Date of Response: August 2, 2002

REQUEST: Please state what percentage of each subsidiary Philadelphia owns and provide a list of the twenty (20) largest shareholders of Philadelphia.

OBJECTION: PSC objects to this request since it seeks information that is not relevant nor likely to lead to the admission of relevant evidence in this proceeding. Without waiving this objection, PSC will provide a list of its officers and directors.

Pennichuck Water Works, Inc.
Pennichuck Aqueduct Company
Pennichuck East Utility, Inc.

DW 02-126

Philadelphia Suburban Corporation's Response to City of Nashua's First Set of Data Requests

Date Request Received: July 29, 2002
Data Request No.: Nashua PSC 1-15

Date of Response: August 2, 2002

REQUEST: Please provide any study or report of the synergies expected to result from the merger.

OBJECTION: PSC objects to this request to the extent it seeks confidential, proprietary information. PSC will provide documents responsive to this request once an appropriate protective order is entered in this matter.